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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 J.C., individually,

11 Plaintiff,

12 vs.

13 SOCIETY OF JESUS, OREGON PROVINCE,  
14 an Oregon Corporation,

15 Defendant.

NO. 2:05-CV-01662-JLR

PLAINTIFF'S INITIAL DISCLOSURES  
PURSUANT TO FRCP 26(a)(1)

16 **A. IDENTITY OF INDIVIDUALS WITH DISCOVERABLE INFORMATION**

17 **1. Plaintiff, J.C.**

18 c/o GORDON, THOMAS, HONEYWELL, MALANCA, PETERSON & DAHEIM, LLP  
19 2100 One Union Square  
Seattle, WA 98101

20 **Plaintiff J.C.** is aware of, among other things, the nature of the abuse he  
21 suffered, along with the damages has sustained as a result of that abuse.

22 **2. Plaintiff, J.C.'s wife -- Susan Cook**

23 c/o GORDON, THOMAS, HONEYWELL, MALANCA, PETERSON & DAHEIM, LLP  
24 2100 One Union Square  
Seattle, WA 98101

25 **Susan Cook** is aware of, among other things, her knowledge and observations  
26 of J.C.'s damages, including emotional difficulties.

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3. **Plaintiff, J.C.'s mother – Elizabeth Cook**

7612 37<sup>th</sup> St., West, Unit 1E  
University Place, WA 98466  
253.566.6197

**Elizabeth Cook** is aware of, among other things, her observations and interactions with Fr. Toulouse, and her knowledge and observations of J.C.'s damages, including emotional difficulties.

4. **Plaintiff, J.C.'s brother – Dale R. Cook**

3805 90<sup>th</sup> Ave Ct. East  
Puyallup, WA 98371  
253.312.0767

**Dale Cook** is aware of, among other things, his observations of and interactions with Fr. Toulouse and has knowledge of J.C.'s damages, including emotional difficulties.

5. **Plaintiff, J.C.'s cousin – Thomas Helm**

Auburn, WA  
253.709.9849

**Thomas Helm** is aware of, among other things, his observations of and interactions with Fr. Toulouse and has knowledge of J.C.'s damages, including emotional difficulties.

6. **Cindy Versherin**

2739 72<sup>nd</sup> Avenue SE  
Mercer Island, WA 98040  
206.232.6732

Ms. Versherin has knowledge of, among other things, Fr. Toulouse victimization of children.

7. **Dr. Bill Lennon**

Bellevue Community Services, Inc.  
2281 116<sup>th</sup> Ave. NE, Suite 6  
Bellevue, WA 98004-3037  
425.454.0616

**Dr. Lennon** is J.C.'s counselor. He is aware of the effect the abuse had on J.C.'s life.

1           **8. Members, employees and/or agents of the Society of Jesus, Oregon**  
2           **Province and/or of Seattle University and/or of the Archdiocese of Seattle,**  
3           including, but not limited to,

4           Fr. Thomas P. Martin, S.J.,  
5           Fr. Patrick J. Ford, S.J.,  
6           Christine Taylor, Chancellor, Archdiocese of Seattle,  
7           Fr. John D. Whitney, S.J.,  
8           Joyce M. Cox, BVM,  
9           Jessie Dye,  
10          Kathryn Johnson,  
11          Michael A. Tyrrell, S.J.,  
12          Rev. Stephen Sundborg, S.J.,  
13          Robert B. Grimm, S.J.,  
14          Most Rev. Alex Brunet, D.D.,  
15          Archbishop Connolly,  
16          Fr. Earl LaRiveiere,  
17          Fr. Joseph Perri, S.J.,  
18          Rev. John Fitterer,  
19          Fr. Louis Gaffney, S.J.,  
20          V. Rev. George L. Thomas, Chancellor, Archdioceses of Seattle  
21          Len Beil,  
22          Bill Sullivan

23          These individuals have knowledge which includes, but is not limited to,  
24          identities of the victims of Fr. Michael Toulouse, knowledge that Fr. Michael  
25          Toulouse was a perpetrator of childhood sexual abuse or potential danger to  
26          children. Moreover, these witnesses are believed to have knowledge about the  
27          Oregon Province of the Society of Jesus' policies and practices regarding the  
28          hiring, monitoring and supervision of its priests and their response to  
29          allegations of childhood abuse.

30           **9. Other victims of childhood sexual abuse – names currently unknown.**

31           **10. Dominick Toulouse, M.D.** nephew of Fr. Michael Toulouse  
32           4011 Talbot Road South, Suite 460  
33           Renton, WA 98055  
34           425.271.5020

35           It is believed that Dominick Toulouse has knowledge of the nature and extent  
36           of Fr. Toulouse abuse of children.

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2       **11.     Stuart Greenberg, Ph.D.**  
3       1217 24<sup>th</sup> Ave. E., Ste. 220  
4       Seattle, WA 98102

5       It is believed that Dr. Greenberg has knowledge relating to the effect Fr.  
6       Toulouse's had on certain victims, has knowledge of his communications with  
7       Fr. Stephen Sundberg, S.J. relating to the nature and extent of the defendant's  
8       knowledge of Fr. Toulouse's activities.

9       Plaintiff reserves the right to identify additional individuals or parties with  
10      discoverable information, including expert witnesses.

11      Plaintiff further reserves the right to call at trial any and all witnesses identified by the  
12      Defendant or which may be identified at a later date by Plaintiff during discovery in this  
13      matter.

14      **B.     DOCUMENTS**

15      1.     Plaintiff identifies the personnel file maintained by defendant for Fr. Michael  
16      Toulouse and produced by defendant to plaintiff's counsel on July 6, 2005. In the interest of  
17      maintaining confidentiality, and to avoid duplicative production of documents, plaintiff does  
18      not attach the documents hereto. If defendant's desire an additional copy of the file, it will be  
19      produced.

20      2.     Clinical records maintained by Dr. Bill Lennon. These documents were  
21      produced to defendant on July 6, 2005. In the interest of maintaining confidentiality, and to  
22      avoid duplicative production of documents, plaintiff does not attach the documents hereto. If  
23      defendant's desire an additional copy of the file, it will be produced.

24      3.     J.C.'s medical records, to be obtained.

25      Plaintiff reserves the right to disclose additional relevant documents as discovery  
26      progresses.

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**C. COMPUTATION OF DAMAGES**

Plaintiff has economic and non-economic damages, including pain and suffering, emotional and psychological injuries, and possible past and future wage loss claims. General damages are a matter for the unique province of the jury. Past and future wage loss will be explained and supported by expert testimony.

**D. INSURANCE AGREEMENTS**

This category is not applicable to Plaintiff.

DATED this 27<sup>th</sup> day of December, 2005.

GORDON, THOMAS, HONEYWELL,  
MALANCA, PETERSON & DAHEIM LLP

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Attorneys for Plaintiff

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